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March 31, 2023

VIA ECF

United States District Court
Southern District of New York
Attn: Hon. Lorna G. Schofield, U.S.D.J.
40 Foley Square, Courtroom 1106
New York, NY 10007-1312

Re: Edelman v. NYU Langone Health System, et al.
Case No.: 1:21-cv-502 (LGS) (GWG)
MLLG File No.: 209-2020

Dear Judge Schofield:

This firm represents the Plaintiff, Dr. Sari Edelman (hereinafter “Plaintiff” or “Dr. Edelman”), in the above-referenced case. Plaintiff writes jointly with the Defendants to respectfully seek a final extension, until Monday, April 3, 2023, of the parties’ deadline to submit the parties’ joint requests to charge, including the joint two paragraph case description, and a one (1) day extension of time of Plaintiff’s deadline to submit a pre-trial memorandum of law. The parties are submitting their joint *voir dire* and verdict form, which they have completed, this evening.

Pursuant to this Court’s Orders dated September 20, 2022, March 28, 2023, and March 30, 2023 (the “Orders”), see Docket Entries 156, 188, and 190, the parties’ deadline to submit the aforementioned documents was yesterday, March 30, 2023.

Pursuant to ¶ I(B)(2) of this Court’s Individual Rules and Civil Procedures, there have been two (2) previous request for an extension of this specific deadline. The reason for the request is that, although the parties have completed the joint *voir dire* and verdict form, and have already met and conferred concerning same as well as the joint requests to charge, the parties need additional time to finalize the joint requests to charge. With respect to Plaintiff’s submission of a pre-trial memorandum of law, Plaintiff needs only one additional day to finalize same given the parties’ extensive efforts with the joint pretrial submissions.

It is respectfully submitted that the requested extension should not affect any of the Court’s other deadlines, although the parties respectfully reserve the right to seek an appropriate extension of time should the need arise.

The parties therefore respectfully submits that there exists good cause and excusable neglect for granting the requested extension. See Fed. R. Civ. P. 6(b)(1)(B).

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Accordingly, the parties' joint letter motion for an extension of time to submit the requests to charge should be granted. The parties thank this Court for its time and attention to this case.

Dated: Lake Success, New York

March 31, 2023

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

/s

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cc: Defendants (via ECF).